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USDS SDNY
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VIA FAX

Honorable Harold Baer, Jr.
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Room 2230
New York, New York 10007
(212) 805-7901 (F)

Re: Meg Kettell v. Suzanne Hall, 05 Civ 52 (HB)

Dear Judge Baer:

I am writing to request the entry of a default judgment pursuant to Fed. R. Civ. P. Rule 55 based on Defendant's failure to serve and file an answer to Defendant's Amended Complaint, which was mailed to Defendant on January 11, 2008, as well as attached as an exhibit to Plaintiff's motion for a preliminary injunction, which was sent by overnight courier on January 13, 2008. There can be no reasonable excuse for the default since Defendant is represented by counsel and has at least two other law firms representing her, each of whom was well aware of these proceedings.

There is an evidentiary hearing presently scheduled for March 3, 2008 on Plaintiff's motion for a preliminary injunction, but Defendant's counsel sent me a letter dated February 5, 2008 in which he stated that Defendant would consent to the preliminary injunction, at least in part, and would not be making a motion for a transfer of venue. Enclosed are copies of Defendant's counsel's letter and my response thereto.

Respectfully submitted,

M. Kettell
Meg Kettell

*we have a PTC
on 2/24 please list the
bundles of items touched on
in your correspondence & question
change of venue, I will attempt to
resolve them all, they may be
pertinent to the complaint although
even that is hard to tell since you
keep seeking to amend, but most seem only underbrush which
we should get off the way as you down your list & then looking at
your PTC which showed attorney with the 1 bundle referred to
above, we prepared together in advance of our PTC.*

*SCORED
BAER
USDS*

Endorsement:

We have a PTC on 2/28 please list the jumble of items touched on in your correspondence e.g., entry of a default judgment, change of venue, injunctive relief, discovery, etc., etc and I will attempt to resolve them all, they may be pivotal to the complaint although even that is hard to tell since you keep seeking to amend, but most seem only underbrush which we should get out of the way by going down your list and then looking at your PTSO which should along with the "jumble" be prepared together and in advance of our PTC.